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*Attorneys for Defendant
Gravitas Nevada Ltd. d/b/a The Apothecarium*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

DANIEL DRAPER, individually and on
behalf of others similarly situated,

Plaintiff,

v.

RHMT, LLC. d/b/a THE APOTHECARIUM,
et al.,

Defendants.

Case No.: 2:20-CV-01423-GMN-VCF

**UNOPPOSED MOTION
FOR EXTENSION OF TIME TO
ANSWER OR OTHER RESPONSIVE
PLEADING ON BEHALF OF
DEFENDANT GRAVITAS NEVADA LTD.
d/b/a THE APOTHECARIUM
AND [PROPOSED] ORDER**

Defendant Gravitas Nevada Ltd. d/b/a The Apothecarium (“Gravitas”), by and through counsel, moves the court for an extension of time to file an Answer or other responsive pleading to Plaintiffs’ Amended Complaint for Damages and Injunctive Relief Pursuant to the Telephone Consumer Protection Act, 47 U.S.C. § 227 et seq. (“Amended Complaint”) in the above-captioned case. In support of this unopposed Motion, Gravitas states:

1. Gravitas’ current deadline to respond to the Amended Complaint is December 1, 2020.

2. This is the third extension sought by Gravitas.

1 3. Gravitas' counsel needs additional time to review and investigate the allegations
2 in the Amended Complaint and attempt to resolve the purported dispute.

3 4. This motion is not made for purposes of hindrance or delay.

4 5. Plaintiff's counsel was consulted and does not oppose this motion for an
5 additional extension for Gravitas to file an Answer or other responsive pleading to the Amended
6 Complaint. If granted, Gravitas will have up to, and including, December 4, 2020, to file an
7 Answer or other responsive pleading to the Amended Complaint.

8 WHEREFORE, Defendant Gravitas Nevada Ltd. d/b/a The Apothecarium requests that
9 the Court enter an Order granting this unopposed Motion for additional time to file an Answer or
10 other responsive pleading to the Amended Complaint, and for any further relief the Court deems
11 just and proper.

12
13 DATED: December 1, 2020

ARMSTRONG TEASDALE LLP

14 By: /s/ Jeffrey F. Barr

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20 *Attorneys for Defendant*
21 *Gravitas Nevada Ltd. d/b/a The Apothecarium*

22 **ORDER**

23
24 IT IS SO ORDERED.

25
26 UNITED STATES MAGISTRATE JUDGE

27 DATED: 12-2-2020

CERTIFICATE OF SERVICE

Pursuant to Fed. R. Civ. P. 5 (b), and section IV of District of Nevada Electronic Filing Procedures, I certify that I am an employee of ARMSTRONG TEASDALE LLP, and that the foregoing was served:

☒ via electronic service to the address(es) shown below:

Gustavo@kazlg.com

Counsel for Plaintiff Daniel Draper and the Putative Class

☐ via the U.S. Postal Service at Las Vegas, Nevada, in a sealed envelope, with first-class postage prepaid, on the date and to the address(es) shown below:

Gustavo Ponce, Esq.
KAZEROUNI LAW GROUP, APC
6069 South Fort Apache Road, Suite 100
Las Vegas, Nevada 89148

Counsel for Plaintiff Daniel Draper and the Putative Class

Date: December 1, 2020

/s/Sheila A. Darling

An employee of Armstrong Teasdale LLP

CERTIFICATE OF SERVICE

Pursuant to Fed. R. Civ. P. 5 (b), and section IV of District of Nevada Electronic Filing Procedures, I certify that I am an employee of ARMSTRONG TEASDALE LLP, and that the foregoing UNOPPOSED MOTION FOR EXTENSION OF TIME TO ANSWER OR OTHER RESPONSIVE PLEADING ON BEHALF OF DEFENDANT GRAVITAS NEVADA LTD. D/B/A THE APOTHECARIUM AND ORDER was served:

☒ via electronic service to the address(es) shown below:

Gustavo@kazlg.com

Counsel for Plaintiff Daniel Draper and the Putative Class

☐ via the U.S. Postal Service at Las Vegas, Nevada, in a sealed envelope, with first-class postage prepaid, on the date and to the address(es) shown below:

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Counsel for Plaintiff Daniel Draper and the Putative Class

Date: December 1, 2020

/s/Sheila A. Darling

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